



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



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LINDA S. ADAMS
SECRETARY FOR
ENVIRONMENTAL PROTECTION

ARNOLD SCHWARZENEGGER
GOVERNOR

Certified Mail: 7003 1680 0000 6167 6582

August 7, 2008

Mr. Tim Casagrande
Deputy Director
Fresno County Department of Community Health
Division of Environmental Health
P.O. Box 11867
Fresno, California 93775-1867

Dear Mr. Casagrande:

The California Environmental Protection Agency (Cal/EPA), Office of Emergency Services, Department of Toxic Substances Control, and the State Water Resources Control Board conducted a program evaluation of the Fresno County Division of Environmental Health Certified Unified Program Agency (CUPA) on May 7 and 8, 2008. The evaluation was comprised of an in-office program review, and field oversight inspections, by State evaluators. The evaluators completed a Certified Unified Program Agency Evaluation Summary of Findings with your agency's program management staff. The Summary of Findings includes identified deficiencies, a list of preliminary corrective actions, program observations, program recommendations, and examples of outstanding program implementation.

The enclosed Evaluation Summary of Findings is now considered final and based upon review, I find that Fresno County Division of Environmental Health's program performance is satisfactory with some improvement needed. To complete the evaluation process, please submit Deficiency Status Reports to Cal/EPA that depict your agency's progress towards correcting the identified deficiencies. Please submit your Deficiency Status Reports to Jennifer Lorenzo every 90 days after the evaluation date. The first deficiency progress report is due on October 30, 2008.

Cal/EPA also noted during this evaluation that Fresno County Division of Environmental Health has worked to bring about a number of local program innovations, including an excellent outreach in the business plan and hazardous waste generator programs. In addition, the CUPA has an outstanding process of integrating pollution prevention, source reduction, and universal waste regulations into the CUPA's routine compliance inspections. We will be sharing these innovations with the larger CUPA community through the Cal/EPA Unified Program web site to help foster a sharing of such ideas statewide.

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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by email at jbohon@calepa.ca.gov.

Sincerely,

[Original signed by Don Johnson]

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosure

cc/Sent via email:

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Mr. Tim Casagrande
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cc/Sent via Email:

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CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

Enclosure



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CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS

CUPA: FRESNO COUNTY DIVISION OF ENVIRONMENTAL HEALTH

Evaluation Date: May 7 and 8, 2008

EVALUATION TEAM

Cal/EPA: Jennifer Lorenzo
OES: Fred Mehr
SWRCB: Sean Farrow
DTSC: Asha Arora

This Evaluation Summary of Findings includes the deficiencies identified during the evaluation, program observations and recommendations, and examples of outstanding program implementation activities. Questions or comments can be directed to Jennifer Lorenzo at (916) 327-9560.

	<u>Deficiency</u>	<u>Corrective Action</u>
1	<p>The CUPA has not fully developed and implemented a procedure for issuing a Unified Program facility permit.</p> <p>At this time, the only permits issued by the CUPA are for underground storage tank (UST) facilities and Tiered Permit (TP) units. These permits are not consolidated onto one unified permit and only the UST permits are issued from the Envision database. The CUPA has met with the Envision management staff to begin implementing a Unified Program facility permit.</p> <p>HSC, Chapter 6.11, Section 25404.2 (a)(1)(A) and CCR, Title 27, Section 15190 [Cal/EPA]</p>	<p>By May 8, 2009, the CUPA will fully implement a consolidated permitting process for its regulated community.</p> <p>By July 30, 2008, the CUPA will meet and confer with its Envision management staff regarding the issuance of a Unified Program Facility Permit using the existing database management system.</p> <p>Beginning October 30, 2008, the CUPA will submit a report of their progress toward correcting this deficiency, including a sample Unified Program Facility Permit recently issued, if available.</p>
2	<p>The CUPA's Inspection and Enforcement (I&E) Program Plan does not contain some required elements. The I&E Program Plan is missing the following:</p> <ol style="list-style-type: none">1. Identification of all available enforcement options. For example, the use of red tags for the underground storage tank (UST) program is not identified, but has been used by the CUPA.2. A graduated series of enforcement actions that may	<p>By December 27, 2008, the CUPA will revise its I&E Program Plan to include all the required elements.</p>

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	<p>be taken by the CUPA based on the severity of the violation. The CUPA has a graduated series of enforcement actions for its hazardous waste generator program only.</p> <p>CCR, Title 27, Section 15200 (b) [Cal/EPA]</p>	
3	<p>The CUPA is not inspecting all stationary sources at least once every three years. This deficiency was identified during the CUPA's previous evaluation in June 2006 and remains outstanding.</p> <p>In the last three fiscal years (FY), the CUPA has only inspected 14 of the 93 regulated businesses.</p> <p>HSC, Chapter 6.95, Section 2775.3 [OES]</p>	<p>By October 30, 2008, the CUPA will develop and submit an action plan outlining how the CUPA will inspect all of the stationary sources once every three years.</p> <p>Beginning October 30, 2008, the CUPA will submit a report of their progress, including the number of facilities inspected.</p>
4	<p>The CUPA has not performed an annual California Accidental Release Prevention (CalARP) performance audit.</p> <p>CCR, Title 19, Section 2780.5 [OES]</p>	<p>By September 30, 2008, the CUPA will perform an annual CalARP performance audit. At the CUPA's option, this information may subsequently be included with the annual California Code of Regulations title 27 Self-Audit Report.</p>
5	<p>The CUPA is not inspecting all regulated businesses subject to the hazardous materials reporting requirements, including farms, at least once every three years. This deficiency was identified during the CUPA's previous evaluation in June 2006 and remains outstanding.</p> <p>In the last three years, the CUPA has inspected an estimated 839 of approximately 2,203 regulated businesses.</p> <p>HSC, Chapter 6.95, Section 25508 (b) [OES]</p>	<p>By October 30, 2008, the CUPA will develop and submit an action plan outlining how the CUPA will inspect all of the regulated businesses once every three years.</p> <p>Beginning October 30, 2008, the CUPA will submit a report of their progress, including the total number of business plan facilities and the number of facilities inspected for compliance.</p>
6	<p>The CUPA is exempting facilities that handle, store and/or use carbon dioxide without following the correct process for allowing this exemption.</p> <p>HSC, Chapter 6.95, Section 25503.5 (c)(4) [OES]</p>	<p>This deficiency was corrected on June 9, 2008.</p>
7	<p>The CUPA is allowing underground storage tank (UST) facilities to operate with expired operating permits.</p> <p>File research indicated that there are numerous UST facilities operating without current permits.</p> <p>HSC, Chapter 6.7, Section 25284 (a)(1) [SWRCB]</p>	<p>By August 30, 2008, the CUPA will go through its files and identify the UST facilities that have not been issued current UST operating permits.</p> <p>Beginning October 30, 2008, the CUPA will update Cal/EPA and SWRCB on the status of bringing those facilities into compliance.</p>

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8	<p>The CUPA is not re-inspecting UST facilities to verify that violations have been corrected.</p> <p>CCR, Title 23, Section 2712 (e) [SWRCB]</p>	<p>Beginning May 9, 2008, the CUPA will re-inspect UST facilities that were cited for violations. If the re-inspection of UST facilities becomes unmanageable and if violations are minor, the CUPA will follow its I&E Program Plan.</p> <p>By October 30, 2008, the CUPA will submit the number of UST facilities that were cited for violations and the number of facilities that have returned to compliance.</p>
9	<p>The CUPA is not ensuring that Unified Program Consolidated Forms (UPCF's) received from UST businesses are complete.</p> <p>Files reviewed showed that in some instances, information was missing from the UST forms.</p> <p>HSC, Chapter 6.7, Section 25286 (a)(c) [SWRCB]</p>	<p>By May 8, 2009, the CUPA will ensure that all UPCF's are completely filled out. As facility inspections arise, review the UPCF's and ensure that all elements of the forms are complete and are as accurate as possible.</p> <p>Beginning October 30, 2008, the CUPA will update Cal/EPA and SWRCB on the status of bringing those facilities into compliance.</p>
10	<p>UST plot plans reviewed did not contain all the required elements or were missing altogether.</p> <p>CCR, Title 23, Section 2711 (a)(8) [SWRCB]</p>	<p>By May 8, 2009, the CUPA will ensure that all UST plot plans are complete. As facility inspections come up, check for file completeness and update as necessary.</p> <p>Beginning October 30, 2008, the CUPA will update Cal/EPA and SWRCB on the status of bringing those facilities into compliance.</p>
11	<p>The CUPA is not conducting hazardous waste generator inspections with a frequency consistent with its I&E Program Plan, which is triennial. This deficiency was identified during the CUPA's previous evaluation in June 2006 and remains outstanding.</p> <p>Based on the Annual Inspection Summary Report 3, the CUPA inspected 10.5 percent of its hazardous waste generator facilities in FY 04/05, 15 percent in FY 05/06, 15.2 percent in FY 06/07. In addition, a review of the facility files showed that of the 20 generator files reviewed, four facilities had not been inspected within the last three years:</p>	<p>The CUPA will prioritize inspections based on the risk and complexity of the facilities, including Resource Conservation Recovery Act (RCRA) large quantity generators (LQG's).</p> <p>Beginning October 30, 2008, the CUPA will provide the number of inspections conducted.</p>

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	<ul style="list-style-type: none"> • Safety Kleen has never been inspected. • Bruno Iron and Metal LP was last inspected in July 2002. • New Connection Auto Repair has never been inspected. • Valley Chrome has never been inspected. <p>The CUPA has made efforts toward meeting its inspection frequency. The CUPA has inspected 14.7 percent of its hazardous waste generators in the first two quarters of FY 07/08.</p> <p>CCR, Title 27, Section 15200 (a)(3) [DTSC]</p>	
12	<p>The CUPA has not submitted quarterly inspection or enforcement reports for RCRA LQG's since October 2006.</p> <p>CCR, Title 27, Section 15290 (e) and (g) [DTSC]</p>	<p>Beginning August 1, 2008, the CUPA will submit LQG reports to DTSC and, subsequently, on a quarterly basis thereafter.</p> <p>As a reminder, the reports must be submitted to DTSC quarterly, on February 1, May 1, August 1, and October 15. If the CUPA did not do any inspections or take any enforcement at a RCRA LQG facility, please submit a notice letting DTSC know that the CUPA did not have any activities to report by sending an email to Asha Arora at aarora@dtsc.ca.gov or Maria Soria at msoria@dtsc.ca.gov.</p>
13	<p>The CUPA is not inspecting its TP facilities at least once every three years. Based on the Annual Inspection Summary Report 3, the CUPA inspected one out of 20 TP facilities during FY 04/05, five out of 19 during FY 05/06, and eight out of 12 during FY 06/07. In addition, a review of the files showed that of the 10 TP files reviewed, four had not been inspected in the past three years. For example:</p> <ul style="list-style-type: none"> • Valley Chrome has never been inspected. • Guardian Industries was last inspected in October 2003. • Pacific Coast Anodizing was last inspected on June 7, 2004. • Western Chrome was last inspected on August 21, 2003. <p>HSC, Chapter 6.5, Sections 25201.4 (b)(2) and CCR, Title 27, Section 15200 (a)(3) [DTSC]</p>	<p>The CUPA will complete inspections of all TP facilities within a three-year inspection cycle. The CUPA will prioritize inspections based on the risk and complexity of the facilities.</p> <p>By October 30, 2008, the CUPA will provide the total number of TP facilities and number of compliance inspections conducted.</p>

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14	<p>The CUPA is not citing violations in a manner consistent with the definition of a minor, Class II or Class I as provided in statutes and regulations. For example:</p> <p>Most of the inspection reports noted minor violations or no violations. The following are examples without violation classifications.</p> <ul style="list-style-type: none"> • The inspection report dated August 19, 2003, for Commercial Electroplating noted no training documents, no contingency plan, and no closure plan as minor violations. • The inspection report, dated April 19, 2006, for Commercial Electroplating noted no closure plan and secondary containment assessment, and no waste analysis plan. • The inspection report, dated August 21, 2003, for Duncan Enterprise Inc. noted no waste analysis plan and treatment units were closed without any closure documentation. • The inspection report dated August 28, 2007, for New Age Metal Finishing did not include the classes of violations. • The inspection report dated June 15, 2005, for WRC did not include the classes of violations noted. <p>HSC, Chapter 6.5, Sections 25110.8.5 and 25117.6, and Chapter 6.11, Section 25404, and CCR, Title 22, Section 66260.10 and Title 27, Section 15200 (a) [DTSC]</p>	<p>The CUPA will refresh staff knowledge of the definitions of Class I, Class II and minor violations. A good tool for refresher training may include covering the Cal/EPA "Violation Classification Guidance Document for Unified Program Agencies," which is available on the Cal/EPA Web site under Unified Program-Publications and Forms.</p> <p>By October 30, 2008, the CUPA will provide violation determination and TP training to its inspectors.</p>
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CUPA Representative

VINCENT MENDES

(Print Name)

Original signed

(Signature)

Evaluation Team Leader

JENNIFER L. LORENZO

(Print Name)

Original signed

(Signature)

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

The observations provided in this section address activities that the CUPA implement and are not specifically required of the CUPA by regulation or statute. The recommendations, if any, are provided for continuous improvement and it is the CUPA's decision whether or not to follow the recommendations.

1. **Observation:** The CUPA has a high single fee collection rate of 92.0 percent, 99.6 percent, and approximately 100 percent for the last three fiscal years.
2. **Observation:** The CUPA's administrative policies and procedures, I&E Program Plan, Web site, and other documents contained outdated information. The following are examples:
 - a. The Fresno County Environmental Health Division's Policy and Procedure Manual was last updated on August 1, 1993. Also, the fee schedule is old.
 - b. The CUPA's I&E Program Plan contains outdated citations to regulations and outdated information on aboveground storage tank (AST) facilities.
 - c. The CUPA's Web site contained old UST-related forms and guidelines and also outdated information and regulatory requirements on AST facilities.
 - d. The CUPA's "Hazardous Materials Business Plan and Risk Management Plan Information Booklet" contains outdated contacts information.
 - e. The CUPA's facility files reviewed showed outdated contact information on emergency plans/procedures.

Recommendation: Cal/EPA recommends that the CUPA should review current Unified Program statutes and regulations and ensure that all citations to regulations are correct on all documents, plans, policies, and procedures. Cal/EPA, SWRCB, DTSC, and OES recommend that the CUPA revise and update all necessary documents, plans, forms/templates, policies/procedures, Web site information, and other publicly available information to reflect current information, such as but not limited to statutes and regulations, the CUPA's current policies and procedures, and contacts information.

Cal/EPA recommends the CUPA to include the annual review date on its I&E Program Plan, documenting the requirement per title 27 of the California Code of Regulations, section 15200 (b). Cal/EPA also recommends applying the enforcement procedures flow chart on page 14 of the CUPA's I&E Program Plan to all Unified Program elements, instead of the hazardous waste generator/tiered permit program only, as classifications of violations are now required to be reported on the Annual Enforcement Summary Report for all program elements. In addition, DTSC recommends that the CUPA documents how the CUPA expends five percent of its hazardous waste related resources to the oversight of universal waste handlers and silver-only generators in its I&E Program Plan.

Also, as the CUPA updates its Web site, DTSC recommends that the CUPA provide information on silver-only generators, such as a fact sheet for which an example may be found on DTSC's Web site at http://www.dtsc.ca.gov/HazardousWaste/upload/HWM_FS_SB2111.pdf.

3. **Observation:** The CUPA has a mechanism to receive comments, feedback or complaints through telephone calls, via electronic mail, or in the form of a written documentation (such as a letter from a

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regulated business). The CUPA plans to develop a customer service survey for feedback to be readily available on its new Web site.

4. **Observation:** The CUPA has had difficulties for at least five years in fully maximizing the tools available within Fresno County Division of Environmental Health. The CUPA has been unable to fully utilize the Envision database management system. As such, the CUPA has not been able to fully track and report the violations and return to compliance information using the existing database information. However, as of May 8, 2008, the CUPA has finally begun implementing the *Logging and Tracking Violations* feature of Envision for Microsoft Windows by Decade Software. In addition, the CUPA staff has no access to Envision for minor edits to general CUPA program information. The CUPA also plans to have a Web portal for online and electronic submittals of regulated facility information.

Recommendation: Cal/EPA and DTSC encourages the CUPA to continue implementing the *Logging and Tracking Violations* feature of Envision and ensure the accuracy of information prior to importing the data onto the Annual Inspection and Enforcement Summary Reports. The CUPA program staff should also have access to the data management system for the CUPA program elements to ensure accuracy. In addition, as the CUPA progressively moves toward an electronic and paperless technology via its Web portal, the CUPA should be able to implement its program with full access to all its resources.

5. **Observation:** OES observed that the CUPA is forwarding the business plan information to emergency response agencies; however, the maps are not always clear or legible. The CUPA is in the process of creating a Web-based portal for businesses to electronically submit Unified Program information, which will include standardized formatting of facility maps. The CUPA has invited all local fire agencies to participate in a workgroup to develop standardized policies for business plans and maps.

Recommendation: The CUPA is encouraged to continue coordinating with first responders on standardizing the business plans and maps on its anticipated online portal.

6. **Observation:** During the UST oversight inspection on May 6, 2008, the CUPA inspector did not ask for permission to inspect the facility nor did the inspector introduce himself immediately, which is inconsistent with the CUPA's inspection procedures. Also noted during the oversight inspection, the inspector did not ask the technician for training certificates and the inspector did not check to see if the fill risers had flapper valves or ball floats.

The inspector stated he asked the technician on the type of spill prevention, because the facility's spill buckets were already being tested upon arrival at the facility.

Recommendation: CUPA inspectors should consistently follow the CUPA's inspection procedures per its I&E Program Plan. Prior to starting an inspection, introduce yourself to facility management and let them know what is going to happen during the inspection. SWRCB also recommends that the CUPA inspectors ask the technician for current manufacturer's training certificates and inspect the fill riser for the type of spill prevention. In addition, the CUPA is encouraged to provide a place for consent to inspect on all inspection reports. Documentation of consent serves to strengthen any potential enforcement case defeating any potential challenge that the fourth amendment may have been abridged.

7. **Observation:** The monitoring requirements on the UST operating permit are basic in nature.

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Recommendation: SWRCB recommends that the CUPA either add more detail to the permit or as a condition of the permit; then attach the completed and approved monitoring plan to the permit. Examples of other CUPA permits have been given to the CUPA.

8. **Observation:** Correction timeframes and dates are not consistently written on the UST inspection reports. Files reviewed showed that CUPA inspectors are not indicating the re-inspection date and/or the number of days in which the facility needs to correct the violation(s) on the UST inspection reports.

Recommendation: SWRCB recommends that prior to having the facility manager or representative sign the report, insert the number of days that the facility has to correct the violations and also indicate the reinspection date for consistency. If the CUPA feels that the information is not necessary to be included on their UST inspection reports and since the CUPA already sends follow-up notices that clearly state the timelines and correction timeframes needed to return to compliance, then the CUPA should remove the information on its UST inspection report to minimize duplicate information.

9. **Observation:** The CUPA has access to and routinely use a camera to document violations at regulated facilities. One CUPA inspector took photographs during the hazardous waste generator inspection on May 6, 2008, to document violations observed.

Recommendation: DTSC and SWRCB encourage the CUPA inspectors to continue to use the camera to document violations during inspections. Photographs are useful to document violations and the conditions at facilities. Photographs could help strengthen your case should enforcement become necessary.

10. **Observation:** During the hazardous waste generator oversight inspection, DTSC observed that the CUPA inspector built a good rapport with the facility representatives. The CUPA inspector was also professional and courteous in explaining hazardous waste and universal waste requirements.

11. **Observation:** The CUPA was not able to demonstrate that complaints which were referred by DTSC between March 1, 2005, to March 1, 2008, were investigated. Minimal or no follow-up documentation could be found for the following complaint numbers: 07-0807-0418, 06-0906-0477, 06-0706-0341, and 06-0706-0365.

Recommendation: Ensure that all complaints from DTSC are being received by the CUPA by providing the e-mail address of the person who should receive complaints to the DTSC complaint coordinator (nlancast@dtsc.ca.gov). Investigate and document all complaints referred. Investigation does not always entail inspection, as many issues may be resolved by other means such as a phone call. In any instance, it is suggested that all investigations be documented, either by an inspection report or by "note to file" and placed in the facility file.

12. **Observation:** The CUPA's hazardous waste generator inspection reports provide space for additional notes; however, the CUPA did not consistently note the details of the Class I or II violations.

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Recommendation: Additional information could be added to the CUPA's inspection reports to support Class I and II violations. DTSC recommends that CUPA inspectors add details of the observed violations to provide a clear and concise picture of any violations and strengthen the inspection reports when informal or formal enforcement actions are necessary.

13. **Observation:** The CUPA rarely used a TP checklist.

Recommendation: DTSC recommends that the CUPA staff use a TP checklist to conduct TP inspections, which includes a hazardous waste generator component, to ensure that no rule, regulation, or statute is inadvertently overlooked. For example, a sample TP checklist is readily available for public download from the Unidocs Web site. A subscription to Unidocs is not required to download the checklist.

14. **Observation:** The CUPA's hazardous waste generator/TP files were incomplete in that it did not consistently include complete addresses or the EPA ID Numbers of the facilities. For example, the following inspection reports did not include the facility's EPA ID No.: Rutter Armey, Inc., inspection report dated March 16, 2006; WRC inspection report dated August 20, 2003; Western Chrome inspection report dated August 21, 2003; Ano-tech Metal inspection report dated April 20, 2006; Meclec Metal Finishing inspection report dated September 23, 2005; Duncan Enterprise Inc. inspection reports dated August 21, 2003, and December 9, 2005; and Commercial Electroplating inspection reports dated August 19, 2003, and April 19, 2006.

Recommendation: DTSC recommends that the CUPA staff include complete address on its inspection reports. DTSC also recommends that the EPA ID No. be included as recommended on the "Inspection Report Writing Guidance for Unified Program Agencies" developed by the Unified Program Administration and Advisory Group (UPAAG) Inspection Workgroup in 2005.

15. **Observation:** Although the CUPA has incorporated a consent to inspect a facility on its hazardous waste generator inspections reports, the CUPA staff does not always document the consent.

Recommendation: DTSC recommends that the CUPA documents consent on its inspections reports. Documentation of consent serves to strengthen any potential enforcement case defeating any potential challenge that the fourth amendment may have been abridged.

16. **Observation:** Based on a file review of New Age Metal Finishing, it appears that this TP facility may have more than one treatment unit indicated on the inspection report dated August 21, 2007. In addition, based on a file review of the TP notification for the Guardian Fabrication Inc. dated October 31, 2003, it appears that the facility may not be operating under the correct treatment tiers.

Recommendation: DTSC recommends that the CUPA staff verify proper treatment tiers during the inspection.

17. **Observation:** During the hazardous waste generator oversight inspection on May 6, 2008, DTSC observed the following:

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- One of the CUPA inspectors wore tennis shoes at an LQG facility.
- The inspection checklist was inconsistently used; for example, the inspectors failed to request the facility's hazardous waste determination.

Recommendation: CUPA inspectors should follow the personnel health and safety requirements appropriate for the type of facility being inspected and the CUPA staff should also consistently use their inspection checklist.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA has a website with an extensive wealth of information for its community. Various UPCF's, fact sheets, and resources are available for all CUPA programs: business plan, UST (including UST installation guidelines and closure guidelines), CalARP, hazardous waste generator, TP, universal waste, and household hazardous waste (HHW) programs. The household hazardous waste disposal information is also available in English and Spanish for the public. Inspection reports are also available for review on the Fresno County Environmental Health Inspection Network website.

The CUPA has an excellent outreach program for the business plan and hazardous waste generator/TP programs. The CUPA has conducted business plan presentations with various City of Fresno divisions to relay information on program requirements for compliance with current regulations. Recently, a hazardous materials informational brochure, which is also available in Spanish, has been developed for distribution to the regulated community.

2. The CUPA maintains great coordination with other agencies within its region. Participation with other agencies includes joint multi-media CUPA inspections with the Fresno Metropolitan Flood Control District, City of Fresno Code Enforcement, Fire Prevention, and Wastewater Pretreatment and Discharge divisions. The CUPA continues to communicate with incorporated city agencies and continues the process of implementing enforcement coordination agreements with County and City Fire Agencies regarding hazardous materials and hazardous waste programs.

In addition, the CUPA staff is participating in the Greater Fresno Area Pollution Prevention Committee. The goal of the committee is to conduct educational outreach and develop new strategies for pollution prevention to regulated businesses and the community. One of the CUPA's supervisory staff is also an active participant in the Unified Program Administrative and Advisory Group.

The CUPA is also working with the Fresno County Agricultural Commissioner in an outreach effort to identify and capture agricultural handlers throughout the county.

3. The CUPA has an excellent self-audit report that depicts the CUPA's program activities during the reporting year. This information is presented in a clear and concise manner.
4. The CUPA has done an excellent job of taking formal enforcement over the past three fiscal years, initiating 13 Administrative Enforcement Orders (AEO's) and assessing \$71,135 in penalties. Over the last three FY's, at least 88.5 percent of all penalties assessed have been collected (\$60,135). In addition, as of May 8, 2008, the CUPA has issued four AEO's for the current fiscal year. The CUPA has also issued red tags against 16 UST facilities since the CUPA's last evaluation in June 2006.
5. The CUPA has identified 679 additional sites to its regulated universe since the last fiscal year, which was a total of 1,994 regulated businesses. The CUPA has hired two knowledgeable part-time staff to investigate undiscovered businesses, then evaluate the business for appropriate unified program elements and start the process for compliance.
6. The CUPA is 95 percent fee-funded this fiscal year, which is outstanding.
7. The CUPA does an exceptional job of integrating pollution prevention, source reduction, and universal waste regulation into its routine inspection activities.